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12  
13 Attorney for  
*Jackson Lewis*

14 UNITED STATES BANKRUPTCY COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 **In re:**

18 **PG&E CORPORATION,**

19 **&**

20 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

22 **Debtors.**

Case No. 19-30088  
Chapter 11  
(Lead Case)

**MOTION TO ALLOW LATE FILING OF  
PROOF OF CLAIM; DECLARATION OF  
JACKSON LEWIS**

23 **Date: December 15, 2020**  
**Time: 10:00 a.m.**  
**Place: United States Bankruptcy Court**  
**Courtroom 17, 16th Floor**  
**San Francisco, CA 94102**

1 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT  
2 JUDGE, THE OFFICE OF THE UNITED STATED TRUTEE, AND ALL INTERESTED  
3 PARTIES:

4 Jackson Lewis (“Movant”) respectfully files this motion to allow late filing of proof of  
5 claim (“Motion”) against the Chapter 11 Bankruptcy of PG&E Corporation and Pacific Gas  
6 and Electric Company. In support of the Motion, the Creditor respectfully represent as follows:  
7

8 **1. Summary of Argument**

9 A creditor that was not scheduled and did not receive notice of a claims bar date may file a  
10 claim and have it deemed timely. In this case, Jackson Lewis was neither scheduled nor  
11 received notice of the bar date set in PG&E and Pacific Gas and Electric Company’s  
12 bankruptcy. Furthermore, because there is no danger of prejudice to the Debtors, the length of  
13 the delay and its potential impact on judicial proceedings is minimal, the reason for the delay is  
14 justifiable, and because the Movant acted in good faith, a finding of excusable neglect is  
15 warranted. Thus, the Movant should not be barred from filing a timely claim against PG&E  
16 and Pacific Gas and Electric Company’s bankruptcy.

17 **2. Factual Background**

18 **A. Movants Claims Arising from the Butte Fire<sup>1</sup>**

19 Jackson Lewis lived at the property at 18381 Baker Riley Way in Mokelumne Hill,  
20 California, which his family owned and occupied until the events of the Butte Fire. On  
21 September 9, 2015, the Butte Fire destroyed the property and all its contents. Because Jackson  
22 was 16 at the time, he was overwhelmed by the devastation the Butte Fire caused. The events  
23 of the fire caused significant disruption to Jackson’s life and education. Jackson has struggled  
24 to emotionally process the hardships his family has suffered, the displacement forced Jackson  
25 to readjust to a new community, and he has spent a significant amount of time trying to put his  
26 life back together.

27  
28 

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<sup>1</sup> See, Declaration of Jackson Lewis ¶¶4-11, and See, Declaration of Timothy Lewis ¶¶4-11

1           At the time of the fire, Jackson was a minor and would have been unable to file a  
2 lawsuit without the assistance of his legal guardian, his father Timothy Lewis. Timothy Lewis  
3 did not contemplate that Jackson's legal interests may not be included in his lawsuit or that he  
4 might need to include Jackson individually in the lawsuit. Timothy filed a Proof of Claim on  
5 his own behalf on October 15, 2019, but he did not know his children would not be included.  
6 Even though Jackson had reached the age of majority by the time Timothy filed a Proof of  
7 Claim, he never realized that he may have a claim separate from his parents and that he could  
8 pursue that claim on his own behalf. By the time Jackson understood that he was not included  
9 in his father's claim, the claim deadline had passed.

10           **B. The PG&E and Pacific Gas and Electric Company Chapter 11 Case**

11           On January 29, 2019, PG&E and Pacific Gas and Electric Company filed a voluntary  
12 petition under Chapter 11 of Title 11 of the United States Code ("Bankruptcy Case"). See  
13 Court's PACER Docket for Case No. 19-30088 as of June 19, 2020. PG&E's chapter 11  
14 filings were necessitated by a confluence of factors resulting from catastrophic fires that  
15 occurred in Northern California prior to the Petition Date, and PG&E's potential liabilities  
16 arising therefrom.

17           The deadline for filing all proofs of claim in respect of any prepetition claim  
18 including all claims of Fire Claimants and for the avoidance of doubt, all secured claims and  
19 priority claims, against either of the Debtors was October 21, 2019 at 5:00 p.m. (the "General  
20 Bar Date"). However, this deadline was extended to December 31, 2019 (the "Extended Bar  
21 Date") solely for the benefit of any non-governmental Fire Claimants who did not file a proof  
22 of claim by the General Bar Date. (*See, Dk. No. 4672.*)

23           **3. Legal Argument**

24           **A. Application of The *Pioneer* Factors Justify a Finding of Excusable Neglect**

25           In a Chapter 11 case, the time to file a proof of claim may be extended under certain  
26 circumstances. Fed. R. Bank. Pro. 3003(c)(3). The bankruptcy court has "broad equitable  
27 powers" in a Chapter 11 case with respect to the timing requirement for proofs of claim.  
28 *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507 U.S. 380, 389

1 (1993). Even a creditor that did in fact receive notice may file a proof of claim notwithstanding  
2 the expiration of a claims bar date in a Chapter 11 case upon a showing of “excusable neglect.”  
3 *Id.* at 394–95 (“Had respondents here been prevented from complying with the bar date by an  
4 act of God or some other circumstance beyond their control, the Bankruptcy Court plainly  
5 would have been permitted to find ‘excusable neglect’ [under FRBP 9006].”). In considering  
6 whether a creditor’s failure was the product of “excusable neglect,” the court should take  
7 “account of all relevant circumstances surrounding the party’s omission,” including  
8 “the danger of prejudice to the debtor, the length of the delay and its potential impact on  
9 judicial proceedings, the reason for the delay, including whether it was within the reasonable  
10 control of the movant, and whether the movant acted in good faith.” *Id.* at 395.

11       In this case, application of all four *Pioneer* factors weigh in favor of the Jackson Lewis.  
12 First, there is no danger of prejudice to the Debtors as Debtors’ estates are solvent, and all  
13 creditors stand to be paid. See, e.g., *In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr.  
14 S.D.N.Y. 2015) and *In re Sheehan Mem’l Hosp.*, 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014)  
15 (where the chapter 11 estate is solvent, “the proper remedy for a late filing is not the  
16 expungement of a claim, but its allowance as a tardily filed claim only.). Secondly,  
17 immediately upon receiving all the necessary information the Subject Proof of Claim was filed.  
18 *See Bateman v. US Postal Service*, 231 F. 3d 1220, 1225 (9<sup>th</sup> Cir. 2000) (holding that a delay of  
19 “a little more than one month... was still not long enough to justify denying relief.”). Thirdly, the  
20 delay in filing the Subject Proof of Claim is reasonable considering that immediately upon  
21 becoming aware of Jackson’s situation, a proof of claim was filed on his behalf. Lastly, any  
22 prospect of prejudice beyond solvency is unlikely given (a) all distributions have not been  
23 made; and (b) the value of Jackson’s claim relative to the value of Debtors’ estates is low. See,  
24 e.g., *In re Keene Corp.*, 188 B.R. 903, 910 (Bankr. S.D.N.Y. 1995) (size of the late claim in  
25 relation to the estate is a consideration in determining prejudice).

26       **B. Creditors Were Not Given Notice of The Claims Bar Date**

27       [D]ue process demands that a creditor in a Chapter 11 case receive reasonable notice of  
28 a claims bar date before it is effective against the creditor.” *Monster Content, LLC v.*

1      *Homes.com, Inc.*, 331 B.R. 438, 442 (N.D. Cal. 2005). The Federal Rules of Bankruptcy  
2      Procedure specify that “the clerk, or some other person as the court may direct, shall give the  
3      debtor, the trustee, all creditors and indenture trustees at least 21 days’ notice by mail of... the  
4      time fixed for filing proofs of claims pursuant to Rule 3003(c).” Fed. R. Bankr. P. 2002(a).  
5      Indeed, the Ninth Circuit has held that “the creditor who is not given notice, even if he has  
6      actual knowledge of the reorganization proceedings, does not have a duty to investigate and  
7      inject himself into the proceedings.” *In re Maya*, 78 F.3d 1395, 1399 (9th Cir. 1996). A late-  
8      filed proof of claim is allowable where a creditor had actual notice of the bankruptcy but, due  
9      to some external reason, failed to file a proof of claim or did not realize that she had to, before  
10     the bar date. *See, e.g., ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.)*, 450 F.3d 996, 1003–07 (9th  
11     Cir. 2006) (applying the *Pioneer* factors). Therefore, a creditor who does not receive 21 days’  
12     notice of a claims bar date and does not otherwise contemplate that she is required to file a  
13     proof of claim, should be permitted to file a proof of claim after the bar date.

14        In this case, the Court should grant the Motion and allow the claimant to file a timely-  
15        claim because neither Jackson nor his parents received notice from PG&E and Pacific Gas and  
16        Electric Company that the claims deadline was rapidly approaching. At the time of the fire,  
17        Jackson was a minor and would have been unable to file a lawsuit without the assistance of his  
18        legal guardian, his father Timothy Lewis. Timothy Lewis did not contemplate that he might  
19        need to file a lawsuit on Jackson’s behalf. Timothy filed a Proof of Claim on his own behalf on  
20        October 15, 2019, but he did not know his children would not be included. Additionally,  
21        Jackson had reached the age of majority by the time Timothy filed a Proof of Claim, which  
22        enabled Jackson to file his own Proof of Claim before the deadline. Without any notice,  
23        however, Jackson never realized that he may have a claim, separate from his parents, and that  
24        he could pursue it on his own behalf. By the time Jackson understood that he was not included  
25        in his father’s claim, the claim deadline had passed.

26        Considering the fact that Jackson Lewis did not receive notice, nor did his parents, and  
27        that Jackson was struggling to put his life back together after the fire, all while processing the  
28

1 significant emotional impact of the fire and her family's displacement, a finding of excusable  
2 neglect should be permitted, and the Court should grant the motion.

3       **4. Conclusion**

4           For the reasons set forth above, the Creditor requests that (1) the Court enter an order  
5 allowing the Creditor to file a claim against PG&E and Pacific Gas and Electric Company's  
6 Chapter 11 Bankruptcy and have the proof of claim be deemed timely; and (2) for such other  
7 and further relief as the Court deems just and proper under the circumstances of this case.

8           Dated: December 2, 2020

9           **DANKO MEREDITH**

10          By: /s/ Kristine K. Meredith  
11                   KRISTINE K. MEREDITH  
12                   Attorney for Creditor  
13                   Mykayla Lewis

## **Declaration of Jackson Lewis**

I, Jackson Lewis, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. I make this Declaration in support of this motion to allow late filing of proof of claim ("Motion"), filed by myself against the Chapter 11 Bankruptcy of PG&E and Pacific Gas and Electric Company.
3. I am informed and believe that facts set forth in this Declaration are true of my personal knowledge, and if called upon to do so I could and would competently testify to these facts.
4. I did not receive a letter in the mail from PG&E and Pacific Gas and Electric Company stating I only had 21 days left to file a proof of claim.
5. My family owned and I lived at 18381 Baker Riley Way, Mokelumne Hill, CA 95245.
6. The Butte Fire destroyed that property and all my possessions within it.
7. My Birthday is June 22, 1999.
8. I was sixteen on September 9th, 2015, the date the Butte Fire began.
9. My father is Timothy Lewis, and he was my legal guardian at the time of the Butte fire.
10. The trauma that I experienced in the Butte Fire had a profound negative effect on my life including displacing me from my home and disrupting my education.
11. Due to this trauma, I avoid revisiting the events by thinking about them or discussing the events with anyone, even my family.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 30, 2020.

DocuSigned by:  
  
8749E5FED95D4EB

JACKSON LEWIS

## 1 Declaration of Timothy Lewis

2 I, Timothy Lewis, say and declare as follows:

- 3 1. I am an individual over 18 years of age and competent to make this Declaration.
- 4 2. I make this Declaration in support of this motion to allow late filing of proof of claim  
("Motion"), filed by Jackson Lewis against the Chapter 11 Bankruptcy of PG&E and  
Pacific Gas and Electric Company.
- 5 3. I am informed and believe that facts set forth in this Declaration are true of my personal  
knowledge, and if called upon to do so I could and would competently testify to these  
facts.
- 6 4. My family owned and I lived at 18381 Baker Riley Way, Mokelumne Hill, CA 95245.
- 7 5. The Butte Fire destroyed that property and all my possessions within it.
- 8 6. I am the father of Jackson Lewis and Mykayla Lewis and acted as the legal guardian of  
Jackson Lewis and Mykayla Lewis until the date of their 18th birthday.
- 9 7. I filed a Proof of Claim against PG&E and Pacific Gas and Electric Company in the  
matter of In re: PG&E and Pacific Gas and Electric Company, Bankruptcy Case 19-  
30088 on October 15th, 2019.
- 10 8. Jackson and Mykayla were both minors on September 9th, 2015, the date of the Butte  
Fire.
- 11 9. Jackson and Mykayla had reached the age of majority by the date I filed a Proof of  
Claim, October 15th, 2019.
- 12 10. I did not receive a letter in the mail from PG&E and Pacific Gas and Electric Company  
stating I only had 21 days left to file a proof of claim on behalf of my children Jackson  
Lewis and Mykayla Lewis.
- 13 11. I did not otherwise contemplate that it would be necessary to file a Proof of Claim on  
behalf of my children.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
15 DocuSigned by:  
16 November 30, 2020.  
17

18   
19 8749F5FED95D4EB..

20 Timothy Lewis  
21

## **ATTACHMENT A**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)**

**In re:**  
**PG&E CORPORATION,**  
**- and -**  
**PACIFIC GAS AND ELECTRIC**  
**COMPANY,**  
**Debtors.**

**Bankruptcy Case**  
**No. 19-30088 (DM)**  
**Chapter 11**  
**(Lead Case)**  
**(Jointly Administered)**

## **Proof of Claim (Fire Claim Related)**

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

**Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.**

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

**Part 1: Identify the Claim**

1. Who is the current creditor?	Jackson Lewis		
Name of the current creditor (the person or entity to be paid for this claim)			
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Are you filing this claim on behalf of your family?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____ _____		
4. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name <u>Corey, Luzaich, de Ghetaldi &amp; Riddle LLP</u> Attorney Name (if applicable) <u>Amanda L. Riddle</u> Attorney Bar Number (if applicable) <u>215221</u> Street Address <u>700 El Camino Real</u> City <u>Milbrae</u> State <u>California</u> Zip Code <u>94030</u> Phone Number <u>(650)871-5666</u> Email Address <u>alr@coreylaw.com</u>	Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____	
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____		
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		
Filed on _____ MM / DD / YYYY			

**Part 2:****Give Information About the Claim as of the Date this Claim Form is Filed**

7. What fire is the basis of your claim? Check all that apply.		<input type="checkbox"/> Camp Fire (2018) <input type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input checked="" type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.?)		Location(s): 18381 Baker Riley Way, Mokelumne Hill, CA 95245
9. How were you and/or your family harmed? Check all that apply		
<input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Renter <input type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): _____ <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) _____ <input type="checkbox"/> Business Loss/Interruption <input type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input checked="" type="checkbox"/> Agricultural loss <input type="checkbox"/> Other (Please specify): _____		
10. What damages are you and/or your family claiming/seeking? Check all that apply		
<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____		
11. How much is the claim?		
<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date		

**Part 3: Sign Below**

The person completing  
this proof of claim must  
sign and date it.  
FRBP 9011(b).

If you file this claim  
electronically, FRBP  
5005(a)(2) authorizes courts  
to establish local rules  
specifying what a signature  
is.

A person who files a  
fraudulent claim could be  
fined up to \$500,000,  
imprisoned for up to 5  
years, or both.  
18 U.S.C. §§ 152, 157, and  
3571.

*Check the appropriate box:*

I am the creditor.  
 I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

**Signature:** /s/Amanda L. Riddle  
/s/Amanda L. Riddle (Nov 30, 2020 07:54 PST)

**Email:** timoteelewis@yahoo.com

\_\_\_\_\_  
Signature

**Print the name of the person who is completing and signing this claim:**

Name	Amanda L. Riddle		
	First name	Middle name	Last name
Title	Attorney for Creditor		
Company	Corey, Luzaich, de Ghetaldi & Riddle LLP		
Identify the corporate servicer as the company if the authorized agent is a servicer.			
Address	700 El Camino Real		
	Number	Street	
	Millbrae		CA 94030
Contact phone	City	State	ZIP Code
	(650)871-5666		Email <u>alr@coreylaw.com</u>

**Attach Supporting Documentation** (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

I have supporting documentation.  
(attach below)       I do not have supporting documentation.

**PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.**

**IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION** When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

# Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157 and 3571.

## How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.  
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

## Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at  
<https://restructuring.primeclerk.com/pge>.

## **Understand the terms used in this form**

**Claim:** A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

**Creditor:** A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101(10).

**Debtor:** A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

**Information that is entitled to privacy:** A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

**Proof of claim:** A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

**Redaction of information:** Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

## **Offers to purchase a claim**

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

## **Please send completed Proof(s) of Claim to:**

### **If by first class mail:**

PG&E Corporation Claims Processing Center  
c/o Prime Clerk LLC  
Grand Central Station, PO Box 4850  
New York, NY 10163-4850

### **If by overnight courier or hand delivery:**

PG&E Corporation Claims Processing Center  
c/o Prime Clerk LLC  
850 Third Avenue, Suite 412  
Brooklyn, NY 11232

**You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):**

Chico Service Center  
350 Salem Street  
Chico, CA 95928

Marysville Service Center  
231 "D" Street  
Marysville, CA 95901

Napa Service Center  
1850 Soscol Ave. Ste 105  
Napa, CA 94559

Oroville Service Center  
1567 Huntoon Street  
Oroville, CA 95965

Redding Service Center  
3600 Meadow View Road  
Redding, CA 96002

Santa Rosa Service Center  
111 Stony Circle  
Santa Rosa, CA 95401

**Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.**

**Do not file these instructions with your form**